



STATE OF WASHINGTON  
**DEPARTMENT OF HEALTH**  
COMMUNITY AND FAMILY HEALTH  
HIV PREVENTION AND EDUCATION SERVICES  
Post Office Box 47830, Olympia, Washington 98504-7830

November 22, 2005

To: Interested Persons

From: John F. Peppert, HIV Prevention, Department of Health  
Craig D. McLaughlin, Executive Director, State Board of Health

Subject: Names Retention of Asymptomatic HIV Case Reports and Expanded HIV Laboratory  
Test Reporting – Washington Administrative Code 246-101

The State Board of Health has filed public notice of its intent to review rules adopted in 1999 requiring public health officials to convert the names of asymptomatic HIV cases to a code within 90 days of receipt of a complete case report. Case reports for symptomatic HIV cases, including AIDS cases, would continue to be maintained as standard named reports.

In recent letters, the Centers for Disease Control and Prevention (CDC) clarified its policy for the acceptance of HIV case data:

“CDC has had and will maintain a policy to accept only HIV case surveillance data collected, reported, and maintained in state/local HIV/AIDS surveillance systems using confidential name-based methods.” “CDC will continue to ensure that HIV surveillance data reported to CDC are consistent with the ongoing policy.”

It is highly likely that Washington State will lose federal funding for the care and treatment of persons with HIV or AIDS if the State Board of Health does not amend its rules to allow the names of asymptomatic HIV cases to be retained. We are currently reviewing other CDC communications to determine what timelines are required for Washington State to be able to submit data to the CDC in time to maintain full eligibility for Ryan White CARE Act funding.

In addition, current Board rules require the reporting of CD4+ (T4) lymphocyte counts less than 200 and/or CD4+ (T4) percents less than 14 percent of total lymphocytes (patients aged thirteen or older) and positive HIV viral culture tests.

The Council of State and Territorial Epidemiologists (CSTE) has recommended laboratory reporting of all viral load test results (detectable and undetectable) and reporting of all levels of CD4+ T-lymphocyte counts and percentages to ensure prevalent cases are entered quickly and efficiently into the surveillance system. The CDC has made the same recommendation. Proposed changes to the Board rules would require laboratories to report all CD4 and viral load test results, regardless of level. The change should reduce the burden on laboratories of having to sort test results by which are “reportable” versus those that are not.

Staff is reviewing CDC requirements and CSTE recommendations in order to draft proposed revisions to administrative code. Prior to formal consideration of changes in administrative code by the State Board of Health, representatives of the Board and the Department of Health will be seeking comments on *Draft 1 of Proposed Changes*. Two stakeholder meetings are scheduled so that Board and DOH staff can receive comments on *Draft 1 of Proposed Changes* from various parts of the state. Please see the Stakeholder Meeting Announcement for meeting dates, times and locations.

By December 1, 2005, *Draft 1 of Proposed Changes*, as well as copies of the letters from the CDC and CSTE, will be available at:

[http://www.doh.wa.gov/cfh/HIV\\_AIDS/Prev\\_Edu/HIV\\_Policy\\_Review.htm](http://www.doh.wa.gov/cfh/HIV_AIDS/Prev_Edu/HIV_Policy_Review.htm)

To obtain a printed copy of these materials, please contact Stephanie Pisas at 360-236-3434 or at [stephanie.pisas@doh.wa.gov](mailto:stephanie.pisas@doh.wa.gov).

For those unable to attend one of the meetings, written comments received by December 31, 2005 will be considered. The Stakeholder Meeting Announcement includes directions for submitting comments.

Attachment

# **Names Retention of Asymptomatic HIV Case Reports and Expanded HIV Laboratory Test Reporting**

## **STAKEHOLDER MEETING ANNOUNCEMENT**

Meeting Purpose: Gain community, public health, and other perspectives on proposed changes to state rules designed to:

1. Comply with CDC reporting requirements for names retention of reported HIV cases
2. Modify reporting requirements of certain laboratory HIV tests to ensure reporting of prevalent cases quickly and efficiently into the surveillance system

Rules considered in this review include:

- WAC 246-101-201 Notifiable conditions and laboratories
- WAC 246-101-520 Special conditions -- AIDS and HIV
- WAC 246-101-635 Special conditions -- AIDS and HIV

Other sections of chapters 246-100 and 246-101 WAC may be added to this review as necessary.

By December 1, 2005, copies of the letters from the CDC and CSTE including requirements and recommendations, as well as *Draft 1 of Proposed Changes*, will be available at:  
[http://www.doh.wa.gov/cfh/HIV\\_AIDS/Prev\\_Edu/HIV\\_Policy\\_Review.htm](http://www.doh.wa.gov/cfh/HIV_AIDS/Prev_Edu/HIV_Policy_Review.htm)

To obtain a printed copy of these materials, please contact Stephanie Pisas at 360-236-3434 or at [stephanie.pisas@doh.wa.gov](mailto:stephanie.pisas@doh.wa.gov).

**Meeting dates, times and locations are presented below.**

Date:	<b>December 12, 2005</b>	Date:	<b>December 13, 2005</b>
Time:	7 p.m.–9 p.m.	Time:	12 p.m.–2 p.m.
Location:	Seattle Central Community College Third Floor, Room 3211 Seattle, Washington	Location:	WestCoast Ridpath Hotel Terrace Rooms A and B 515 W. Sprague Spokane, Washington

Meeting locations will be barrier free. If you need special accommodations, please contact Harla Eichenberger by December 2, 2005 at 360-236-3424.

### Written Comments

Comments received by December 31, 2005 will be considered. Comments may be sent by regular mail, fax or email to:

HIV Rule Review, Post Office Box 47840, Olympia, Washington 98504-7840

Fax: 360-236-3400, Attention: HIV Rule Review

E-mail: [john.peppert@doh.wa.gov](mailto:john.peppert@doh.wa.gov)

For e-mail submissions, please include HIV Rule Review in the Subject line.